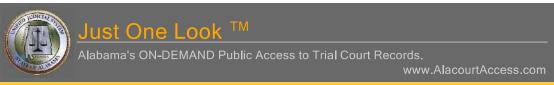
Page 1 of 57

2023 Nov-09 PM 02:11 U.S. DISTRICT COURT N.D. OF ALABAMA

### **COMPOSITE EXHIBIT A**

### **COMPOSITE EXHIBIT A**

State Court Action Docket



#### **ALABAMA SJIS CASE DETAIL**

PREPARED FOR: NICHOLAS BEDO

11/8/2023 9:48:34 AM

acourt:com

County: 31 Case Number: CV-2023-000072.00 Court Action: Style: TRENTON GARMON, ET AL VS ALPHABET, INC. DBA GOOGLE

Real Time

Case Info	ormation				
County:	31-ETOWAH	Case Number:	CV-2023-000072.00	Judge:	GCD:GEORGE C. DAY, JR.
Style:	TRENTON GARMON	, ET AL VS ALPHABET, INC.	DBA GOOGLE		
Filed:	09/12/2023	Case Status:	ACTIVE	Case Type:	BAD FAITH/FRAUD/MISR
Trial Type:	JURY	Track:		Appellate C	ase: 0
No of Plaintiffs:	2	No of Defendants:	1		
Damages	3				
Damage Amt:	0.00	Punitive Damages:	0.00	General Da	mages: <b>0.00</b>
No Damages:		Compensatory Dama	ges: 0.00		
Pay To:		Payment Frequency:		Cost Paid E	By:
Court Ac	tion				
Court Action Cod	de:	Court Action Desc	o:	Court Action	Date:
Nicona of Total days					
Num of Trial day	rs: 0	Num of Liens:	0	Judgment Fo	or:
Dispositon Date		Num of Liens: Disposition Judge		Disposition T	ype:
Dispositon Date Revised Judgem	of Appeal: nent Date:	Disposition Judge Minstral:		ŭ	ype:
Dispositon Date Revised Judgem Date Trial Began	of Appeal: nent Date: n but No Verdict (TBN)	Disposition Judge Minstral: √1):		Disposition T	ype:
Dispositon Date Revised Judgem Date Trial Began	of Appeal: nent Date:	Disposition Judge Minstral: √1):		Disposition T	ype:
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Dispositon Date Revised Judgem Date Trial Began Date Trial Began Comment Comment 1: Comment 2:  Appeal Info Appeal Date: Appeal Status: Appeal To: Disposition Date Comment Da	of Appeal: nent Date: n but No Verdict (TBNV ts  ormation  Of Appeal: ative Informatio	Disposition Judge Minstral:  /1):  /2):  Appeal Case Number: Orgin Of Appeal: Appeal To Desc:	o: :	Disposition T Appeal Date:	ype:

#### Parties

Party 1 - Plaintiff INDIVIDUAL - GARMON TRENTON

Party Info	ormation						
Party:	C001-Plaintiff	Name:	GARMON TRENTON			Туре:	I-IND <b>I</b> V <b>I</b> DUAL
Index:	D ALPHABET INC	Alt Name:		Hardship:		. урс. J <b>I</b> D:	GCD
	75 ARLING PLACE	, qui riamo.		Phone:	(917) 995-21		
Address 1:	75 ARLING I LAGE			r none.	(311) 333-21		
	GADSDEN	Ctoto	AL	7in.	25004 0000	Countra	II.e
City:	GADSDEN	State:	AL	Zip:	35901-0000	•	US
SSN:		DOB:		Sex:		Race:	
Court Ac	tion						
Court Action:				C	ourt Action D	ate:	
Amount of Judg	gement: \$0.00		Court Action For:	E:	xemptions:		
Cost Against Pa	=		Other Cost: \$0.00		ate Satisfied:		
Comment:	urty. Tolor		Circl Cost. Tolor		rrest Date:		
	Data		Manager Astis a Otation			4!	
Warrant Action	Date:		Warrant Action Status:	51	tatus Descrip	tion:	
Service In	formation						
Issued:	Issued Type:		Reissue:	P	eissue Type:		
Return:	Return Type:		Return:		eturn Type:		
Served:	Service Type		Service On:	No <u>t</u> i	etum Type: ice et No.Ans	wer:	
Answer:	Answer Type:		Notice of No Service:	٠,	erved by.		
Allswei.	Allswei Type.		Notice of No Service.				
Attorneys	<u> </u>						
Number		Type of Counsel	Name	Email			Phone
	/titorney code						
A 44 4	000000		DDO CE				
Attorney 1	000000		PRO SE				
arty 2 - Plain	tiff INDIVIDUAL		PRO SE INORS (SG, JG, JG, & SG)		THROUGH		
	tiff INDIVIDUAL				THROUGH	1	
arty 2 - Plain	tiff INDIVIDUAL			BY AND T		Туре:	I-INDIVIDUAL
arty 2 - Plain Party Info	tiff INDIVIDUAL	- GARMON M	INORS (SG, JG, JG, & SG)	BY AND T	THROUGH		I-INDIVIDUAL GCD
Party Info	tiff INDIVIDUAL ormation C002-Plaintiff	- GARMON M  Name: Alt Name:	INORS (SG, JG, JG, & SG)	BY AND 1	rhrough	Type: J <b>I</b> D:	
Party Info Party: Index: Address 1:	cormation  C002-Plaintiff  D ALPHABET INC	- GARMON M  Name: Alt Name:	INORS (SG, JG, JG, & SG)	BY AND 1 SG) BY AND T Hardship:	THROUGH T	Type: J <b>I</b> D:	
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Party Info Party: Party: Index: Address 1:	cormation  C002-Plaintiff  D ALPHABET INC  TRENTON ROGERS 75 ARLING PLACE	- GARMON M  Name: Alt Name:	INORS (SG, JG, JG, & SG) GARMON MINORS (SG, JG, JG, &	BY AND 1 SG) BY AND T Hardship:	THROUGH T	Type: J <b>I</b> D: <b>73</b>	GCD
Party Info Party Info Party: Index: Address 1: Address 2: City: SSN:	ctiff INDIVIDUAL Dormation C002-Plaintiff D ALPHABET INC TRENTON ROGERS 75 ARLING PLACE GADSDEN	- GARMON M  Name: Alt Name: GARMON  State:	INORS (SG, JG, JG, & SG) GARMON MINORS (SG, JG, JG, &	BY AND TO SG) BY AND TO Hardship: Phone:	THROUGH No (917) 995-21	Type: J <b>I</b> D: <b>73</b> Country:	GCD
Party Info Party: Index: Address 1: Address 2: City: SSN: Court Ac	ctiff INDIVIDUAL Dormation C002-Plaintiff D ALPHABET INC TRENTON ROGERS 75 ARLING PLACE GADSDEN	- GARMON M  Name: Alt Name: GARMON  State:	INORS (SG, JG, JG, & SG) GARMON MINORS (SG, JG, JG, &	SG) BY AND THardship: Phone: Zip: Sex:	THROUGH No (917) 995-21 35901-0000	Type: JID: 73  Country: Race:	GCD
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Party Info Party: Index: Address 1: Address 2: City: SSN: Court Ac	ctiff INDIVIDUAL Dormation  C002-Plaintiff  D ALPHABET INC TRENTON ROGERS 75 ARLING PLACE GADSDEN	- GARMON M  Name: Alt Name: GARMON  State:	INORS (SG, JG, JG, & SG) GARMON MINORS (SG, JG, JG, &	SG) BY AND THardship: Phone: Zip: Sex:	THROUGH No (917) 995-21 35901-0000	Type: JID: 73  Country: Race:	GCD
Party Info Party: Index: Address 1: Address 2: City: SSN: Court Action:	ctiff INDIVIDUAL cormation  C002-Plaintiff  D ALPHABET INC TRENTON ROGERS 75 ARLING PLACE GADSDEN  ction  gement: \$0.00	- GARMON M  Name: Alt Name: GARMON  State:	INORS (SG, JG, JG, & SG) GARMON MINORS (SG, JG, JG, &	BY AND TO SG) BY AND TO Hardship: Phone: Zip: Sex:	THROUGH  No  (917) 995-21  35901-0000  ourt Action D	Type: JID: 73  Country: Race:	GCD
Party Info Party Info Party: Index: Address 1: Address 2: City: SSN:  Court Ac Court Action: Amount of Judge	ctiff INDIVIDUAL cormation  C002-Plaintiff  D ALPHABET INC TRENTON ROGERS 75 ARLING PLACE GADSDEN  ction  gement: \$0.00	- GARMON M  Name: Alt Name: GARMON  State:	INORS (SG, JG, JG, & SG) GARMON MINORS (SG, JG, JG, & AL Court Action For:	BY AND THE HARDSHIP SENSE SEX:	THROUGH No (917) 995-21 35901-0000  ourt Action D  xemptions:	Type: JID: 73  Country: Race:	GCD
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Party 2 - Plain Party Info Party Info Party: Index: Address 1: Address 2: City: SSN:  Court Action: Amount of Judg Cost Against Pa Comment: Warrant Action  Service In Issued: Return: Served:	cormation  C002-Plaintiff D ALPHABET INC TRENTON ROGERS 75 ARLING PLACE GADSDEN  ction  gement: \$0.00 arty: \$0.00  Date:  formation  Issued Type: Return Type:	- GARMON M  Name: Alt Name: GARMON  State:	INORS (SG, JG, JG, & SG) GARMON MINORS (SG, JG, JG, &  AL  Court Action For: Other Cost: \$0.00  Warrant Action Status:  Reissue: Return: Service On:	BY AND THE HARD SECTION OF THE HARDSHIP: Phone: Zip: Sex: Cip: Air Signature of The Hardship: RRRRRRRRRRRRRRRRRRRRRRRRRRRRRRRRRRRR	Ourt Action D xemptions: ate Satisfied: rrest Date: tatus Descrip eissue Type: eturn Type:	Type: JID: 73  Country: Race: ate:	GCD

PRO SE

Attorneys

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Number Attorney 1 Attorney Code Type of Counsel Name

Email

Phone

#### Party 3 - Defendant BUSINESS - ALPHABET INC DBA GOOGLE Party Information D001-Defendant ALPHABET INC DBA GOOGLE **B-BUSINESS** Party: Name: Type: Index: C GARMON TRENT Alt Name: GOOGLE Hardship: No JID: GCD C/O GOOGLE DATA CENTER Phone: Address 1: (256) 000-0000 Address 2: 48809 AL HIGHWAY 277 City: BRIDGEPORT State: ΑL Zip: 35740-0000 Country: US DOB: SSN: Sex: Race: **Court Action** Court Action Date: Court Action: Amount of Judgement: \$0.00 Court Action For: Exemptions: Cost Against Party: Other Cost: \$0.00 Date Satisfied: Comment: Arrest Date: Warrant Action Date: Warrant Action Status: Status Description: Service Information Issued: Issued Type: Reissue: Reissue Type: Return Type: Notice of No Answer: Return: Return Type: Return: Service On: Served: Service Type Notice of No Service: Answer: Answer Type: **Attorneys** Attorney Code Type of Counsel Number Name Email Phone 000000 Attorney 1 PRO SE

#### Financial

Case	Action	Summ	ary	
Date:	Time	Code	Comments	Operator
9/12/2023	3:36 PM	FILE	FILED THIS DATE: 09/12/2023 (AV01)	CAC
9/12/2023	3:36 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	CAC
9/12/2023	3:36 PM	ASSJ	ASSIGNED TO JUDGE: GEORGE C. DAY, JR. (AV01)	CAC
9/12/2023	3:36 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	CAC
9/12/2023	3:36 PM	TDMJ	JURY TRIAL REQUESTED (AV01)	CAC
9/12/2023	3:36 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	CAC
9/12/2023	3:36 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	CAC
9/12/2023	3:39 PM	C001	C001 PARTY ADDED: GARMON TRENTON (AV02)	CAC
9/12/2023	3:39 PM	C001	INDIGENT FLAG SET TO: N (AV02)	CAC
9/12/2023	3:39 PM	C001	C001 E-ORDER FLAG SET TO "Y" (AV02)	CAC
9/12/2023	3:41 PM	C002	C002 PARTY ADDED: GARMON MINORS (SG, JG, JG, & SG)	CAC
9/12/2023	3:41 PM	C002	INDIGENT FLAG SET TO: N (AV02)	CAC
9/12/2023	3:41 PM	C002	C002 E-ORDER FLAG SET TO "Y" (AV02)	CAC
9/12/2023	3:41 PM	C001	C001 ADDR1 CHANGED FROM: 75 ARLINGTON PLACE (AV02)	CAC
9/12/2023	3:44 PM	D001	D001 PARTY ADDED: ALPHABET INC DBA GOOGLE (AV02)	CAC
9/12/2023	3:44 PM	D001	INDIGENT FLAG SET TO: N (AV02)	CAC
9/12/2023	3:44 PM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	CAC
9/12/2023	3:44 PM	D001	D001 E-ORDER FLAG SET TO "Y" (AV02)	CAC
/12/2023	3:44 PM	C001	LISTED AS ATTORNEY FOR C001: PRO SE (AV02)	CAC

9/12/2023	3:44 PM	C002	LISTED AS ATTORNEY FOR C002: PRO SE (AV02)	CAC
9/12/2023	3:52 PM	EMOT	C001-OTHER - AFFIDAVIT OF SUBSTANTIAL HARDSHIP FILED ON 9/12/2023 3:52 PM.	CAC
9/12/2023	4:07 PM	ESCAN	SCAN - FILED 9/12/2023 - SUMMONS AND COMPLAINT	JEW
9/13/2023	2:47 PM	JEORDE	ORDER GENERATED FOR OTHER - AFFIDAVIT OF SUBSTANTIAL HARDSHIP - RENDERED & ENTERED: 9/13/2023 2:47:11 PM - ORDER	
9/19/2023	10:21 AM	TEXT	*** CLERK'S NOTE *** I SPOKE WITH TRENT GARMON	CAC
9/19/2023	10:21 AM	TEXT	AND ADVISED HIM THAT HIS AFFIDAVIT OR HARDSHIP	CAC
9/19/2023	10:21 AM	TEXT	WAS GRANTED. HE ADVISED ME THAT HE WILL SERVE	CAC
9/19/2023	10:21 AM	TEXT	THE DEFT CERTIFIED MAIL HIMSELF AND FILE THE	CAC
9/19/2023	10:21 AM	TEXT	RETURN WITH THE CLERK'S OFFICE WHEN THEY ARE	CAC
9/19/2023	10:21 AM	TEXT	SERVED. *** END NOTE ***	CAC
9/20/2023	9:23 AM	C001	CASE ACTION SUMMARY PRINTED (AV02)	DOF

mages						
Date:	Doc#	Title	Description	Pages		
9/12/2023 3:52:13 PM	1	DOCKETED MOTION	MOTION - OTHER - AFFIDAVIT OF SUBSTANTIAL HARDSHIP DOCKETED MOTION - Other - AFFIDAVIT OF SUBSTANTIAL HARDSHIP	3		
9/13/2023 2:47:14 PM	3	ORDER	MOTION GRANTED - Other	1		
9/13/2023 2:47:15 PM	4	ORDER - TRANSMITTAL	E-NOTICE TRANSMITTALS	3		



END OF THE REPORT

### **COMPOSITE EXHIBIT A**

State Court Action Pleadings





Rephales, but be to abusy by a contract View, CA 94043

BIRMINGHAM, AL 35217 SEP 28, 2023 \$9.97

R2304N117580-12

			CV-202	23-000	<u>ว</u> าล	
State of Alabama Unified Judicial System Form ARCiy-93 Rev,9/18	COVER S CIRCUIT COURT (Not For Domestic I	- CIVIL CASE	Case Number  Date of Filing:	ַרַ בּוֹעוֹן בּ רַנִינוֹן בּוֹעוֹן בּיִנוֹעוֹן	udge Code:	
FOILIN WYGIA-32 VEA'9110	GEN	NERAL INFORMA		Year		
IN THE CIRCUIT COURT	OF ETOWAH	(Edible Tree) in Ga			, ALABAMA	
Trenton Ga	rmon, Garmon minors	(Name) v	oogie LLC & Alp		BA "Google"	
First Plaintiff Busin	Plaintiff ess   Individual roment   Other	First Defenda	Defendant Business Government	Individual Other		
NATURE OF SUIT: Selec	t primary cause of action, b	y checking box (check	only one) that best cl	haracterizes you	er action:	
TOXX - Other: Like  TORTS: PERSONAL INJURY TOPE - Personal Pr TORE - Real Proper  OTHER CIVIL FILINGS ABAN - Abandoned ACCT - Account & N APAA - Administrativ ADPA - Administrativ	ath General Motor Vehicle illity/AEMLD Medical Legal Other aith/Misrepresentation mess. Defamation See Cpt operty fly Automobile	Enfor  CVRT - Civil F  COND - Condu  CTMP - Conte  CONT - Conte  TOCN - Convu  EQUID - Equity  FORJ - Foreig  FORF - Fruits  MSHC - Habe  PFAB - Prote  EPFA - Elder  FELA - Railro  RPRO - Real I  WYEG - Will/Ti  COMP - Worke  LORP - Petitic	Death Certificate Modificement of Agency Subplights amnation/Eminent Domatement of Court act/Ejectment/Writ of Secrition Contest/Quiet Title on Appeal/Unlawful Detagn Judgment as Corpus/Extraordinary ction From Abuse Protection From Abuse ad/Seaman (FELA)	cena/Petition to Fain/Right-of-Way sizure  //Declaratory Judg a/Sale For Division ainer  //Writ/Mandamus/	ment/Injunction Prohibition  SEP 1 2 26	023
=	☐ INITIAL FILING	A APPEAL FROI DISTRICT COU	RT	ER: CAS:	SANDRA "SAM" RCUIT COURT	FOHNSO CLERK
R	REMANDED	T TRANSFERRE			=	
HAS JURY TRIAL BEEN	DEMANDED? YE		e: Checking "Yes" does trial. (See Rules 38 and			
RELIEF REQUESTED:	☑ MONETARY AWARD	REQUESTED [	NO MONETARY AWAR	D REQUESTED	7	
ATTORNEY CODE:	12 September	2023	Signature of Attorney/	Parks filling this for		
<u> </u>	Date		Organic of Attorney	any mny una ivi	***	<b>.</b>
MEDIATION REQUESTS			Actions: ☑Yes [	□No		

State of Alabama Unified Judicial System

# CTIMANACNIC

Court Case Number

Onnica Judiciai	System	SUN	IMUNS	
Form C-34	Rev. 7/2023	-C	IVIL-	CV-23-72
IN THE CIRCU		COURT OF ETOW		COUNTY, ALABAMA
•	ruit, District, or Juvenii MON, Garmon minors	•	(Name of County) V. Google LLC & Alphabet Inc	. dba "Google"
NOTICE TO	[Name(s) of Plai. Alphabet Inc., 1600	ntiff(s)] Amphitheater Parkway, Mountain	View, CA 94043 USA	ne(s) of Defendant(s)]
MUST TAKE IN FILE THE ORIOTHE COMPLAI MUST BE MAII OF THE PLAIN	MEDIATE ACT GINAL OF YOU NT OR OTHER LED OR HAND D TIFF(S), Trenton Ga	DOCUMENT WHICH IS TON TO PROTECT YOUR TR WRITTEN ANSWER, I DOCUMENT, WITH TO DELIVERED BY YOU OR TON THE Law Center - Alabama, [Name(S	R RIGHTS. YOU OR YOUR A EITHER ADMITTING OR DE HE CLERK OF THIS COURT YOUR ATTORNEY TO THE 1750 Forrest Avenue, Gadsden, Alabama:  s) of Allorney(s)]	
ADDRESS(ES) I The Law Center - A		mon, The Law Center - Alabama, 7	/50 Forrest Avenue, Gadsden, Alabama	5901; Garmon Minors c/o Trenton Garmon
OTHER DOCU	MENT WERE S	OR DELIVERED WITHIN ERVED ON YOU OR A	Plaintiff(s) or Attorney(s)]  30  DAYS AFTER THIS  JUDGMENT BY DEFAULT IN THE COMPLAINT OR OT	SUMMONS AND COMPLAINT OR MAY BE RENDERED AGAINST HER DOCUMENT.
this action upon t	he above-named D	serve this Summons and a coefendant.	CO SERVE PROCESS:  opy of the Complaint or other do  the written request below of  (Signature of Clerk)	pursuant to the  By:
Certified 1	Mail is hereby requ	ested.		
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	Last Name of Person Serv		County, Alabama on	
Docum	with an ind Rules of Civil P	rocedure;	g house or place or usual place o	SEP 12 2023  ule 4(5)A\$6abahara "SAM" JOHNSO  CIRCUIT COURT CLERK f abode with some
	the above-nar	n County, ned Defendant; authorized to receive service of	on-Service e Complaint or other document was , Alabama onwho process pursuant to Rule 4(c), Alaba	o is:
at least 1	a designated process	server pursuant to Rule 4(i)(1)(l not a party to this proceeding, a	B), Alabama Rules of Civil Procedund I am not related within the third of	
spe of Process Server)		Server's Signature)	(Physical Address of Designated Process Server)	
Official Title of Sheriff or Con	stahle)	Server's Printed Name)	(Telephone Number of Designated Process Ser	Ner)

State of Alabama Court Case Number Unified Judicial System SUMMONS -CIVIL-Form C-34 Rev. 7/2023 CV-23-72 COURT OF ETOWAH IN THE CIRCUIT COUNTY, ALABAMA (Circuit, District, or Juvenile) (Name of County) TRENTON GARMON, Garmon minors Google LLC & Alphabet Inc. dba "Google" v. NOTICE TO: [Name(s) of Plaintiff(s)] [Name(s) of Defendant(s)]
[Name(s) of Plaintiff(s)] [Name(s) of Defendant(s)]
[Name(s) of Plaintiff(s)]
[Name(s (Name and Address of Defendant) THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S)
OF THE PLAINTIFF(S), Trenton Garmon, The Law Center - Alabama, 750 Forrest Avenue, Gadsden, Alabama 35901 [Name(s) of Attorney(s)] ADDRESS(ES) IS/ARE: Trenton Garmon, The Law Center - Alabama, 750 Forrest Avenue, Gadsden, Alabama 35901; Garmon Minors c/o Trenton Garmon The Law Center - Alabama Address(es) of Plaintiff(s) or Attorney(s)] THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT. TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS: You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant. Service by certified mail of this Summons is initiated upon the written request below of Alabama Rules of Civil Procedure. pursuant to the [Name(s)] By: (Date) (Name) (Signature of Clerk) Certified Mail is hereby requested. (Plaintiff's/Attorney's Signature) RETURN ON SERVICE Certified Mail Return receipt of certified mail was received in this Office on Personal / Authorized ] I certify that I personally delivered a copy of this Summons and the Complaint or other document to County, Alabama on 2023 (First and Last Name of Person Served) CASSANDRA "SAM" JOHNSON Documents left: with above-named Defendant; CIRCUIT COURT CLERK with an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules of Civil Procedure; at the above-named Defendant's dwelling house or place or usual place of abode with some person of suitable age and discretion then residing therein. Return of Non-Service I certify that service of process of this Summons and the Complaint or other document was refused by \_\_ County, Alabama on \_ the above-named Defendant; an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules As a designated process server pursuant to Rule 4(i)(1)(B), Alabama Rules of Civil Procedure, I certify that I am at least 19 years of age, I am not a party to this proceeding, and I am not related within the third degree by blood or marriage to the party seeking service of process. (Physical Address of Designated Process Server) (Type of Process Server) (Server's Signature)

(Telephone Number of Designated Process Server)

(Server's Printed Name)

(Official Title of Sheriff or Constable)

# IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA IN AND FOR THE SIXTEENTH JUDICIAL CIRCUIT

Trenton Rogers Garmon, \*
Garmon Minors (SG, JG, JG, & SG) \*
Plaintiffs & Affiant, \*

V. \* Case Numbers: Cv-a023.72

Google LLC & Alphabet Inc. \*
doing business as "Google", \*

Defendants.

\*

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\*

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LEGAL COMPLAINT AND

CASSANDRA "SAM" JOHNSON CIRCUIT COURT CLERK

# LEGAL COMPLAINT AND PETITION FOR INJUNCTIVE RELIEF

Comes now the Plaintiff and files this Civil Rights Complaint and Petition/Motion for Injunctive Relief in the State Circuit Court of Alabama for the Sixteenth Judicial Circuit. The basis of relief as set out herein arises to the level of the torts, including defamation per a destructive search result algorithm, herein stated are due both legal and equitable relief. All remedies at law and equity having been exhausted or otherwise tortiously and unconstitutionally impairment and damages remain. In support thereof the Plaintiffs' offer, the following:

### STATEMENT OF THE PARTIES

1. The Plaintiff Trenton Garmon is an adult resident of Alabama and is of sound mind being a partially disabled<sup>2</sup> Veteran of the United States Army, biological and legal father of the minors at issue, and otherwise subjecting himself to subject matter and personal jurisdiction. The Garmon minors are under the age of majority and the four are natural born Alabama citizens. A

<sup>&</sup>lt;sup>1</sup> https://www.bbc.com/news/world-us-canada-65340444 - Legal precedent cited per a recent case with very similar fact and tort pattern for a defaming and destructive search algorithm also filed against Google

<sup>&</sup>lt;sup>2</sup> Impairment limited to ten (10%) percentage to the right leg and ankle.

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CIRCUIT COURT CLURK fifth minor child of the Plaintiff is not named being not currently linked in name on the Google platform to the Plaintiff. The elder four Garmon minors names are linked to the Knowledge Panel and general Search Engine Result which utilizes the defaming, destructive selective algorithm.

- The corporate entity, Google LLC, is a legally formed entity doing business 2. in the State of Alabama with an office and "data center" in the City of Bridgeport in Jackson County, Alabama. The Search Giant operates nationally and globally which includes operating a "Search Engine" platform, among other web search engine platforms. Google LLC as a Defendant is believed to be the corporation responsible for managing, overseeing, delegating, code servicing and otherwise operating the platform: https://www.google.com Defendant Googe LLC has minimum sufficient contacts with the State of Alabama and does business within the State of Alabama earnings billions of revenue over time from the streams of commerce touching upon the State and falling within her Jurisdiction. It is believed to be a duly form corporation with a headquarters based out of Sacramento, California.
- The Alphabet Inc. as a corporation is believed to own, operate and manage 3. Google LLC and otherwise is responsible for the management, oversight, reporting, code compliance, legal compliance, tort mitigation, and general management of Google LLC and her agents. The Alphabet Inc. does business in the State of Alabama to include having minimum significant contacts with the State, earning billions of revenue from the state in time and fact, as well as benefiting from the legal protections and thus obligations befitting Alabama Jurisdiction. It is believed to be a duly form corporation with a headquarters based out of Mountain View, California.

### STATEMENT OF THE FACTS

Google LLC and Alphabet Inc operate a "search engine platform" which 4. engages in the streams of commerce and has an expectation legally of reliance for accurate, correct and non-tortious information. Defendants, like Search Engine Giant competitors Yahoo!, Bing.com and DuckDuckGo have engaged coding and web crawler algorithms which provide users a "search result". The false light and defamation of the negative algorithm exists as of



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today and the defaming "news" results specifically referenced are from July 07, 2023. Google is engaging in "cancel culture" negative algorithms by code design practice which does not correlate to objective organic searches, but intentionally exiles, targets and otherwise seeks to digitally suppress and damage the online reputation of Christians, specifically male, American Caucasian Christians and is otherwise defaming by neglect of objectivity in display the search engine results of Plaintiffs.

- 5. The Defendants, unlike the top three competitors, however are engaged in an intentional destructive algorithm scheme which seeks to reputationally punish "conservatives" or otherwise those whose unpublically specified algorithm criteria assimilates when posting "results". This collectively violates civil tort laws regarding defamation and false light.
- 6. The Defendants have unlike their top three search engine competitors, however, objectively created and encouraged by algorithm coding a form of defamation or "systematic algorithm defamation" which is easily distinguishable from the other top search engine results. And does de facto prove a defamation and the other torts herein reference by very contrast and comparison.
- 7. For instance, a simple search of the Plaintiff's name "Trenton Garmon" across all the Search Engine platforms, but for Google causes the surfacing in a reasonably balanced manner of positive articles, attack articles, negative articles, debunked articles and other general images and data. These search engines include all articles by al.com and alreporter.com which have the name "Trenton Garmon".
- 8. However, the identical search on Google literally renders only three pages in the "News" section with thirty-eight (38) results all of which are negative articles. Not some. But all results are negative on the Google Search platform, unlike the other top three.
- 9. Again, Defendant Google even fails to include a single link or reference to two (2) indisputably positive articles referred to herein as the "Holy Water Case Article" and the "Prominent Civil Rights Lawyer" article. These positive articles surface on all other search engine platforms.
- 10. There are also other positive articles, articles referencing athletic accomplishments to include an exclusive article by the Dothan Eagle, an article regarding philanthropic services, minutes of speaking before the

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Alabama House Committee(s) and well entrenched "not guilty" or other favorable reportable events on behalf of clients that Google by design does not publish when the Plaintiff's name is searched.

- The multiple objective professional articles (hyperlinked herein) are all 11. posted on independent, well respected and credible news outlets by respected journalists, reporters or clerks. Hence, there is a de facto exclusion or negative algorithm utilized by the defendants regarding the Plaintiff as Google suppresses those not even listing them in the "News" result. It is not a matter of the positive plumb line articles being listed on the "last page" of Google. Rather as indicated in the Exhibit Screen Shots - the search engine giant does not even list the positive articles by al.com and alreporter.com. Not a single one.
- Both objective news platforms and both completely excluded from "results" 12. while slanderous, fake news and misrepresentative articles are returned in the search. Yet, Yahoo!, Bing.com and DuckDuckGo list both positive and negative articles, etc.
- The Defendants also defame the Plaintiff by refusing to mitigate, balance 13. and address (1) a "fake mug shot" of the Plaintiff in a green shirt which placed by a troll using a screenshot from an online video of him teaching at the Christian Legal Society (CLS) in Birmingham, Alabama as there is no arrest ever made of Plaintiff in a green dress shirt and same is defaming and a false light; (2) the Defendants refuse to update the "Knowledge Panel" regarding the martial status of the Plaintiff who maintains good grounds for divorce and an annulment, (3) the Defendants search engine algorithm intentionally displays a "bad hair & beard, surprise picture" despite thousand of photographs to include in court, on global television, with family and philanthropic pictures refuses to give balance and displays an arrest photo which involved an incident where Garmon was assaulted by Law Enforcement which a video confirms, (4) the Defendants search engine, compared to the others which do not, lists all negative articles and attack articles which have been debunked while not listing the debunking article which includes a statement about using the word "slave" when speaking out against Mass Incarceration, (5) the Defendants fail to bring medical disclosure balance to an article referencing the Plaintiff's prescription of Cannabis rather referring to it as a "drug" without referecing the doctor's



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order. This is all intentional and defaming, casting false light and including fake jail pictures, misrepresentations regarding statements and general defamation of reputation by negative algorithms.

- 14. Hence, the Defendants list a fake attack article miscontextualizing a situation and refuse to publish a contextual correction. And the Defendants list a negative arrest story without listing the response or correction story of the same newsite (al.com) regarding possession of Cannabis for medical purposes to include by prescription. The medical basis of chronic physical pain as a Veteran of the U.S. army and spectrum issues which were medically considered are thus intentionally suppressed by negative algorithms by the Defendants who refuse to make corrections. All of the effects of the negative algorithm have caused damages and are due to be remedied and redress awarded.
- 15. The refusal of Google to provide a "fair and balanced" algorithm is apparent and otherwise indisputable. The corporate defendant also is very aware that its services generate billions of search results and are interlinked with other sites as well as other individuals. Specifically, the company has linked four of the plaintiffs five minor children therein linking their name to the "social score algorithm" system and otherwise diminishing their general reputational status by way of the links to Plaintiff father and the political, personal and algorithm attack and defamation of same.
- 16. Alabama's tort protection regarding reputation and the statutory law requires truth and a fair and balanced light, therein not defaming. The other top search companies provide a balanced approach, but the Defendants refuse to make corrections and provide a truthful, honest, fair and balanced reflection of forty-four years of living, to include positive articles by credible sources.
- 17. Google even refuses to update the Plaintiff's marriage status. Following multiple "Knowledge Block" suggested edits by a professional, Santiago Leon, and the Plaintiff have made multiple requests of the Defendants to modify the "Knowledge Block" to "Divorced" or "Divorced, Annulment Pending" but the Defendants have refused to create even an accurate reflection of his marital status. The information has been made available on multiple times and the Knowledge Block is not current, true, balanced and not a fair reflection of the Plaintiff's factual reputation. This has caused damages as the Plaintiff is courting and in times past has sought to date only

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to experience confusion within prospects as to whether Plaintiff is truly married or divorced.

- 18. The negative algorithm and intentional search engine optimization of negative results while suppressing the real and positive third-party credible articles is part of defaming and casting into a false light those who do not subscribe to the same worldview and religious practices as the culture and belief system of the Defendants. The torts are based in a negative algorithm designed to suppress and seek to punish and damage conservative Christians specifically to include pro-life, pro-constitutional and pro-Jesus individuals. This has caused multiple contracts and entrepreneurial ventures to not manifest given the framed negative google results are one of the first background "searches" conducted.
- 19. Google by default facto evidence of the algorithm search engine results has intentionally suppressed positive articles to include the "Holy Water" not guilty case of Garmon professional career. Google intentionally defamed and defamed Garmon as a pro life conservative and specifically as a Catholic convert.
- 20. The not guilty in Pinellas Co is online and suppressed by the search engine. The police brutality Garmon experienced is suppressed and a false story presented as true while the facts are suppressed by Google.
- 21. This includes the search engine results on a mobile device only including negative articles and false narratives again while balanced truthful, clearly objective links and positive news are suppressed.
- 22. Only 3 pages of "news" all negative, fake or linked to someone else
- 23. Despite national, state and local positive articles regarding "prominent civil rights lawyer" (<u>alreporter.com</u>), "holy water case" success (<u>al.com</u>), out of state articles, articles from college football, etc.
- 24. The request for a change has been made at least five times with a citation of the case number and the request to change the public profile to "Divorced" as ongoing Parental Alienation exists and Plaintiff is seeking to remarry. The negative algorithm and refusal to provide accurate information is damaging to the Plaintiff and Plaintiff minors.
- 25. Google refuses to knowledge block recognize and place professional profiles and corrective pictures which contextualize an incident of police brutality in the priority list of its "Search" display.

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- 26. Google also displays a photograph of Plaintiff Trenton Garmon Unit CLERK dress shirt wherein he spoke at the Christian Legal Society in Birmingham, Alabama and yet a troller has taken a screenshot of the video, manipulated the picture to appear as an arrest picture and posted it online which Google displays therein defaming Plaintiff(s).
- 27. Google continues by way of its search engine to give credit to and otherwise recognize mitigated facts, actual exonerating records, a conviction of "not guilty" and an order of mitigation by a court which corrected matters.
- 28. Meaning by negative algorithm Google displays as many negative articles as can be trolled and displays pictures in a weighted light toward defamation by refusing to prioritize corrective articles and also provide "Photo Slide" priority in its "Search" response wherein a picture following police brutality has been confirmed as a situation in which the Plaintiff was attacked. Rather Google prefers to depict by priority of other third parties articles a false narrative in a situation wherein Garmon was attacked by a rogue Law Enforcement Officer. This is an allegory of systematic defamation giving credit to fake stories and oppressing true court records and objective facts to include videos which exonerate falsely alleged what would be negative behavior.
- 29. This includes inputting "racist" remarks to the term "slave" while Garmon was referring to himself and his beliefs that the system of law enforcement by corporations were often "slave making" by framing up crime out of public order ordinances. The Plaintiff was followed by Law Enforcement from a lawful establishment being out during a COVID lock-down in protest and with the restaurant owner who is of African descent. Google is continuing a false narrative, casting false light, and otherwise propagating a negative algorithm by suppression with regards to beliefs, behavioral and professional patterns while Garmon is documented as a Veteran, on the spectrum scale, Irish-Cherokee and Catholic civil rights activist.
- 30. It is believed the Plaintiff is specially targeted as a Catholic which has experienced as much persecution in the past 2,000 years as any people group. Hence, Google is antiCatholic or otherwise misproportions reports regarding wine consumption, civil activism and professional services to Christian causes. The Plaintiff maintains the negative algorithm is defaming casting in a false light the teachings of his faith which accepts (i) drinking of

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- wine, (ii) political activism in the public square to include pro-life and pro-family causes and (iii) the speaking out against mass incarceration which is a form of slavery not based on race or ethnicity by legal definition.
- 31. All three pages of Defendant's "News" results list only negative news even with years of articles to include current news site articles on Alabama political site that does not appear, article of time magazine, sport's news and articles that are online do not get crawled and displayed by Google Bot and requests for a fair search result balanced is ignored and facts are refused. Court record confirmed facts. News about cases that are by design suppressed. News about positive philanthropy suppressed. The negative algorithm also intentionally disregards gfile.news, gfile.legal and trentongarmon.info which provide mitigating opportunities to provide a balanced search engine result, as the other top three Search Giant's do.
- 32. Google based on social score defaming patterns suppresses a balanced reflection on its platform which is careless, negligent or malicious. Several willful examples of not "updating" or "correcting". Defaming and oppositional algorithm coding I can also prove. The willful act of not updating the "Knowledge Panel" is per se.
- 33. The Plaintiff has done forty-four (44) years of living, thousands upon thousands of hours of actual real serving and good faith daily life. He is an honorably discharged vet, has three (3) college degrees, served in a pastoral or missionary capacity without complaint [notwithstanding medical depression] since 2006 and thus for approximately seventeen (17) years. He was a pastor of a diverse church for three years and served in the Christian ministry to others, bi-vocationally, since 2008. The defaming, negative algorithm has caused even employment opportunities, partnership ventures and the like to vanish or otherwise not be engaged given the false light, all of which were without issue prior to the defaming result. The defendants thus suppress good, truthful articles and good news tortiously.
- 34. The Plaintiff maintains even with a negative Google algorithm, Yahoo!, Bing.com and DuckDuckGo searches, which are preserved, depict a balanced result, reasonably well and including the three (3) plumb line positive articles [Holy Water Not Guilty case, Prominent Civil Rights Lawyer Public Activism and Medical Cannabis Disclosure with AL.com] which Google de facto suppresses completely.

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- These are starkly contrasting with Google which had literally only negative LERK news on all three pages for its thirty-eight response result for Plaintiff's name. Positive news suppressed and not even retrieved by Google for the search. Reasonable and balanced Bing search results all attacks and fake news and life considered. Duck Duck Go reasonable search results.
- 36. Google thus excludes true information and or positive articles such as:
  - 36.1. <a href="https://www.al.com/breaking/2013/04/accused\_holv\_water\_sprayer\_j">https://www.al.com/breaking/2013/04/accused\_holv\_water\_sprayer\_j</a>
    ov 2.html Holy Water case with a verdict of "Not Guilty" references the Plaintiff as counsel and is completely suppressed, and not even listed on a Google News result despite being on Al.com but was ranked as #2 in prior SEOs on the platform.
  - 36.2. <a href="https://www.alreporter.com/2021/04/20/alabama-cannabis-coalition-to-hold-event-in-huntsville-today/">https://www.alreporter.com/2021/04/20/alabama-cannabis-coalition-to-hold-event-in-huntsville-today/</a> Prominent Civil Rights Lawyer Positive Articles;
  - 36.3. <a href="https://www.al.com/news/anniston-gadsden/2019/06/trenton-garmon-denies-wrongdoing-in-arrest-says-he-uses-medical-marijuana.html">https://www.al.com/news/anniston-gadsden/2019/06/trenton-garmon-denies-wrongdoing-in-arrest-says-he-uses-medical-marijuana.html</a>
    News article disclosing medical prescription which does not even show up as a result in the Google "news" search and is suppressed to page 6 on the general Google Search while the defaming article by negative algorithm is on page one of both the "News" and general Google Search.
  - 36.4. <a href="https://theclick.news/meta-hit-with-alabama-class-action-lawsuit-over-childrens-privacy-rights-on-facebook/">https://theclick.news/meta-hit-with-alabama-class-action-lawsuit-over-childrens-privacy-rights-on-facebook/</a> Positive Article available and not indicated even as a result on Google News.
  - 36.5. <a href="https://www.scribd.com/document/462659890/Pinellas-Sheriff-Falsel-y-Arrests-Lawyer-Pastor-Veteran-for-DUI-and-Child-Abuse-confirms the actual "Not Guilty" and dispels fake news, but Google does not even return a result for this link despite the other search engines listing it.
  - 36.6. <a href="mailto:ttps://topclassactions.com/lawsuit-settlements/privacy/meta-class-action-alleges-company-violated-privacy-rights-of-minors-by-harvesting-their-data/">their-data/</a> Positive link listed by other search engines, but Google "News" completely suppresses it.
  - 36.7. <a href="https://about.me/trenton-garmon">https://about.me/trenton-garmon</a> Positive objective, general data source which Google suppresses.

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Garmon minor children also have their name attached by Knowledge Panel LERK to the Plaintiff therein even causing damages in reputation to the minor children of the Plaintiff. The negative algorithm has caused the loss of law business from the winter of 2019 to and through April 2022 and to his painting and renovation services, general professional employability from October 2022 to current. The negative algorithm has caused even Big Government agent search bias wherein police officers at traffic stops and otherwise any departmental employee who conducts any servicing for whatever purpose upon a basic Google search has a false light impression of Plaintiff Trenton Garmon.

# COUNT ONE DEFAMATION & DEFAMATION PER OUOD

- 41. The Defendants have breached Alabama tort law and defamed per quod the Plaintiff therein causing damages. The Plaintiff adopts all prior allegations in this Complaint as if fully set-out herein.
- 42. The Plaintiff maintains that the Defendants have created, developed, implemented, managed, and organically coded a "negative defaming algorithm" or a "destructive algorithm" designed to target individuals with certain digital criteria markers which includes that of the Plaintiff. The Defendants have knowingly and intentionally maintained a defaming algorithm which suppresses positive articles, positive results and otherwise true and balanced reflection of the Plaintiff's reputation while the other top search engine Giants display the same positive articles Google suppresses by defaming design to the Plaintiff's damages. The Defendants maintain a "highly structured defaming search algorithm". Per 47 U.S. Code § 230 (e)(3) the state tort law from the Code of Alabama remains valid with regards to subject matter jurisdiction.
- 43. The Defendant's "News" results produce statements in articles displayed that are not true but presented as facts (not opinions) that are published and have been read and heard by others.
- 44. Per Ala. Code § 6-5-182 In an action for libel or slander, the plaintiff must prove, unless it shall be admitted by the defendant, the facts showing that the alleged defamatory matter was published or spoken of by the plaintiff. The



- 37. The top two (2) professional search engine remediation and reputation companies claimed it is "contractually impossible" to bring a fair search result contract to fruition given the negative algorithm. One gathered a team of no less than five (5) for a Zoom conference and refused to offer a contract for SEO balanced reputation optimization services citing the "algorithm" as fixed. Charlotte 360 SEO Company was contracted and confirmed the existence of a negative algorithm. The best in the business was consulted and set a Zoom Conference involving no less than five (5) purported "experts" in Search Engine Optimization, Online Reputational Balance and otherwise the coding sequential mechanics of online links which resulted in the conclusion that the Dark Algorithm was in fact categorizing the Plaintiff Father in a manner which made the contract unserviceable.
- 38. The Defendants refuse to Update divorced annulment candidate knowledge panel and provide a real-life balance in the personal and professional picture rotation within the "Knowledge Panel" which purports to be "updatable" and "correctible" while also taking in monies from marketing companies and from search result clicks.
- 39. All three pages for Google "News" search results by "Trenton Garmon" name only of the search giant list only negative news even with years of articles to include current news site articles on Alabama political site that does not appear, article of time magazine, sport's news and articles that are online do not get crawled and displayed by Google Bot and requests for a fair search result balanced is ignored and facts are refused. This while DuckDuckGo, Bing and Yahoo.com all have balanced organic search engine results. The four Garmon minors names are linked to the Knowledge Panel and general Search Engine Result which utilizes the defaming, destructive selective algorithm.
- 40. The Defendants refuse to provide a balanced result even when Court record confirmed facts and the Defendants have been actively noticed or a fair "web crawler algorithm" would otherwise surface the positive or corrective data as has been fairly and displayed in balance by the other major search engine platforms. News about philanthropic, positive results, not guilty finding for a client, not guilty finding in a personal and the like are suppressed. News about positive philanthropy suppressed. All while the

intentional inflection of emotional distress based upon an attachment to their Plaintiff father whose search results are subject to the defaming coding and algorithm of Google which lacks objectivity and balance, unlike the other top search engines.

WHEREFORE premises considered the Plaintiff does demand judgment following a jury trial on the merits of does demand Sixty-Six Million Six Hundred Thousand Dollars (\$66,600,000) or \$66.6 Million American Dollars.

# COUNT THREE NEGLIGENCE & NEGLIGENT ALGORITHM CODING

58. The Plaintiff adopts each and every prior allegation as if set out herein in its entirety. The Defendants have a duty to respond to the request for corrections, updates, balanced depictions, links of corrective articles and otherwise by agreement with the users and Plaintiff have a duty to convey the truth. The Defendants have failed and neglected and been careless in that duty as herein described. The Garmon minors names being linked is based upon an attachment to their Plaintiff father whose search results are subject to the defaming coding and algorithm of Google which lacks objectivity and balance, unlike the other top search engines thus causing damages to the minors by Google's carelessness and negligence. That breach of the duty has caused damages.

WHEREFORE premises considered the Plaintiff does demand judgment following a jury trial on the merits of does demand Sixty-Six Million Six Hundred Thousand Dollars (\$66,600,000) or \$66.6 Million American Dollars.

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COUNT FOUR

PETITION AND CLAIM FOR INJUNCTIVE REPASSINDRA "SAM" JOHNSON CIRCUIT COURT CLERK

- children who have been asked or otherwise had comments made by third-parties regarding negative news which de facto correlates to the pattern of suppression herein identified.
- 54. It is also believed that the negative, destructive online algorithm has caused or contributed to a "glitch" arrest on or about July 14, 2023 and otherwise contributed to defaming light when third-parties "search" the Plaintiffs name. The "glitch" was resolved, but not after an unlawful and unnecessary arrest wherein the officer acknowledged making a search. There have been friends, church members, strangers, colleagues and even antagonists which have seen and been influenced in a negative fashion by the suppressing, negative algorithm search result.
- 55. The Garmon minors names being linked is defaming of them based upon an attachment to their Plaintiff father whose search results are subject to the defaming coding and algorithm of Google which lacks objectivity and balance, unlike the other top search engines.
- 56. Google based on social score defaming patterns suppresses a balanced reflection on its platform which is careless, negligent or malicious. The actions and algorithm coding for search engine results is Defaming of the Plaintiff and casts him in a false light which is due to be legally redressed by an award of damages.

WHEREFORE premises considered the Plaintiff does demand judgment following a jury trial on the merits of does demand Sixty-Six Million Six Hundred Thousand Dollars (\$66,600,000) or \$66.6 Million American Dollars.

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# COUNT TWO CASSANDRA "SAM" JOHNSON INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS IT COURT CLERK

57. The Plaintiff adopts each and every prior allegation as if set out herein in its entirety. The Defendants have engaged in a pattern of intentionally inflicting emotional distress by suppressing positive news articles, positive data regarding the general personality and reputation of the Plaintiff and done so to his damage both financially, reputationally, emotionally and also caused distress. The Garmon minors names being linked which has caused an

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Search" which displayed the negative algorithm results. Falsely imputed character issues regarding veracity or otherwise good will and character as the Plaintiff is an honorably discharged United States Army Vet, former pastor and inactive trial lawyer who honors and obeys good law and the Constitution, yet is depicted in a false light.

- 49. The Defendants have caused significant financial damages to the law business of the Plaintiff therein due to be redressed.
- 50. The negative, fake algorithm has also negatively impacted relationships with life-long friends who are minority or otherwise who have not been in contact with the Plaintiff in-person and yet see a false light search result. The Plaintiff had a reputation of being a well-liked dual athlete accepted in all athletic circles and ministry circles and yet is defamed with false articles inputting racism and otherwise making outlandish claims that civil rights cases which are pro-people are exiling people groups not even related to the parties race or ethnicity involved.
- 51. And hence Google is by its negative algorithm causing personal relationship negative waves and issues, disruptions and loss of enjoyment due to subtle exiles from friends who are minority and read a false news article without the benefit of the corrections or otherwise rebuttal with actual facts. Many prior teammates have not in-person "seen" the Plaintiff and yet upon visits or chance encounters or events the defaming algorithm has caused a distancing effect and otherwise damaged the generally good and longstanding relationships of the Plaintiff with various communities.
- 52. Google is therefore supporting, facilitating, causing organically a projection and otherwise generating as part of its revenue and search engine based Platform, an anti-man and anti-Irish Catholic "News" search result algorithm which does not comport with an objective reflection of the Plaintiff's reputation. The Google Beast Algorithm excludes real, actual stories, fact-laden and displaying misquotes, misrepresentations or outright frauds against the Plaintiff while rebuttal records and news stories exist.
- 53. The Defendants have caused damages to the relationship between the Plaintiff and his minor children given friends and the community of the minor children have been inquired of by individuals who have viewed only the defaming and destructive negative algorithm results. The negative algorithm has caused damages to the relationship with the Plaintiff's minor



Defendants may allege mitigation<sup>3</sup> regarding news article portions regarding the process, charges, professional clients but misrepresentative statements and the suppression by search engine algorithm of positive results is defaming, tortious and actionable.

- 45. "The tort of defamation involves protection of the reputation and good name of the plaintiff." Wright v. State of Alabama, 757 So.2d 457 (Ala.Civ.App., 2000) (quoting Michael L. Roberts & Gregory S. Cusimano, Alabama Tort Law, § 24.0, 831 (1996)). "The elements of a cause of action for defamation are: 1) a false and defamatory statement concerning the plaintiff; 2) an unprivileged communication of that statement to a third party; 3) fault amounting at least to negligence; and (4) either actionability of the statement irrespective of special [(per se)] or the existence of special harm caused by the publication of the statement [ (per quod)]." Wright v. State of Alabama, 757 So. 2d 457 (Ala. Civ. App., 2000). "Slander per se is actionable if it imputes to the plaintiff an indictable offense involving infamy or moral turpitude." Anderton v. Gentry, 577 So.2d 1261, 1263 (Ala. 1991)
- 46. However "Defamation Per Quod" or also known as "Slander per quod is a communication to a third person of a defamatory statement subjecting the plaintiff to disgrace, ridicule, odium, or contempt, although not imputing the commission of a crime involving infamy or moral turpitude." Id. A defamatory statement is one that "tends to harm the reputation of another as to lower him in the estimation of the community or to deter third persons from associating or dealing with him." Blevins v. W.F. Barnes Corporation, et al., 768 So.2d 386 (Ala.Civ.App., 1999)
- 47. Google's negative algorithm by intentionally suppressing positive articles and search results has created an intention result that "tends to harm the reputation of another as to lower him in the estimation of the community or to deter third persons from associating or dealing with him." The absolute suppression of positive articles on Google "News" search is a per se indication of Defamation Per Quod and hence a tort per Alabama law.
- 48. The Defendants have caused damages which include financial loss wherein potential clients with injury cases have specifically stated they were choosing a different lawyer based upon their perception of a "Google

<sup>3</sup> AL Code § 6-5-183 (2022)

- 59. The Plaintiff is entitled after hearing to injunctive relief which is equitable relief to order Google, one of the Search Giants, to cease and desist running its negative, destructive and defaming algorithm.
- 60. The Plaintiff does request at minimum an order issue directing Google to update and correct the "Knowledge Panel" which it refuses to correct. That includes proper demographic information regarding "Divorce" and "Annulment Pending".
- 61. The Plaintiff also request a report be ordered to be made to the Court of the efforts to mitigate the damages, when comparing the results of the top three search Giant competitors, by detailing mitigation of the:
  - 61.1. Fair balance in the picture rotation as requested and done by other Search Giants,
  - 61.2. References completely suppressed by the destructive algorithm by positive articles numbered one to six listed above not being suppressed,
  - 61.3. The actions to recognize links to credible sources,
  - 61.4. Proper recognition of the rebuttal or retraction articles and
  - 61.5. A general response to the de facto basis of the difference between Google in suppressing all positive articles compared to Yahoo!, Bing.com and DuckDuckGo which organically depict a full spectrum response.

WHEREFORE, premises considered the Plaintiffs do herein Petition for Injunctive Relief as stated herein. Given the extent of damages, malicious nature, and overall sacred nature of civil rights the Plaintiff does demand Sixty-Six Million Six Hundred Thousand Dollars (\$66,600,000). Respectfully submitted this 30th day of August 2023.

Arling Place, Gadsden, Alabama 35901 trentongarmon@gmail.com
(P) 917-995-2173

### STATE OF ALABAMA ETOWAH COUNTY

Personally appeared before me Trenton Rogers Garmon, a Notary Public in and for said County and State <u>Iceria</u> Smith, who being by me first duly sworn says: I have read the foregoing questions and have answered the same fully and frankly. The answers subscribed by me are true of my own knowledge.

Petitioner

SWORN to before this  $\sqrt{2}$  day of  $5e^{-\beta}$  mber, 20-23

Notary Public

### SERVICE OF PROCESS

Statement Regarding - The Plaintiff does proffer that Service of Process by Certified Mail will be completed with Green Card uploaded upon the following Defendants at their respective corporately listed addresses:

Google LLC<sup>4</sup>
% Google Data Center
48809 Al Highway 277

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# Bridgeport AL 35740 jacksoncounty@google.com

Google LLC c/o
Corporation Service Company
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Alphabet Inc. 1600 Amphitheater Parkway Mountain View, CA 94043, USA<sup>5</sup>

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<sup>5</sup> https://projeputedlecal.com/row-to-serve-lecal-papers-on-opcore/fr --text=Process%20Service%20cn%20Alphabet%20is [650]%20253%2D0001 &text=7.

### **EXHIBITS**

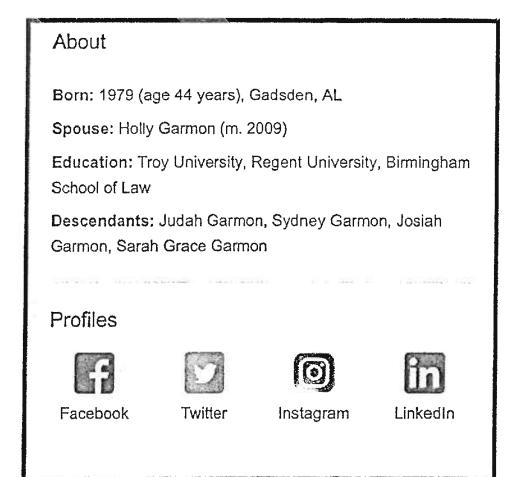
# Google Knowledge Panel Inaccurate and Imbalanced Photo Slider

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\*Defendants intentionally suppress all positive articles from the Google "News" search thirty-eight results and in the picture rotator publish first a picture in a false light by imbalance and refusing to post the rebuttal regarding police brutality. The depiction in a false light along with misrepresentative articles after Garmon was assaulted and battered by Law Enforcement and the charges were dismissed. Along with display of "M" for married following at least five (5) requests for the appropriate change to be made to "Divorced, Annulment pending". The search also indicates an article "arrested on drug charges" and yet suppresses the alcom responsive article referencing the Doctor's Prescription, thus imputing by negative algorithm unlawful behavior over what is legally medicine.



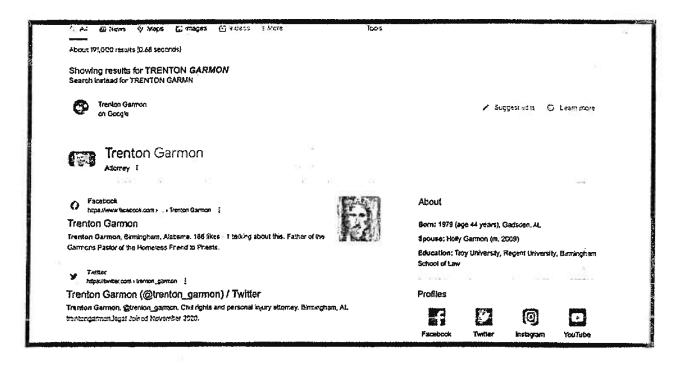
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\*The linked Garmon minors have been asked questions by other minors and in general communities suffered damages due to the false light cast by the Google negative, defaming and malicious algorithm. Additionally, the Plaintiff father's status as a "divorced Catholic seeking annulment" remains uncorrected by Google despite the multiple requests directly to which it neglected and intentionally disregards further propagating false information which limits and impacts the Plaintiff father's personal life to include Courting.



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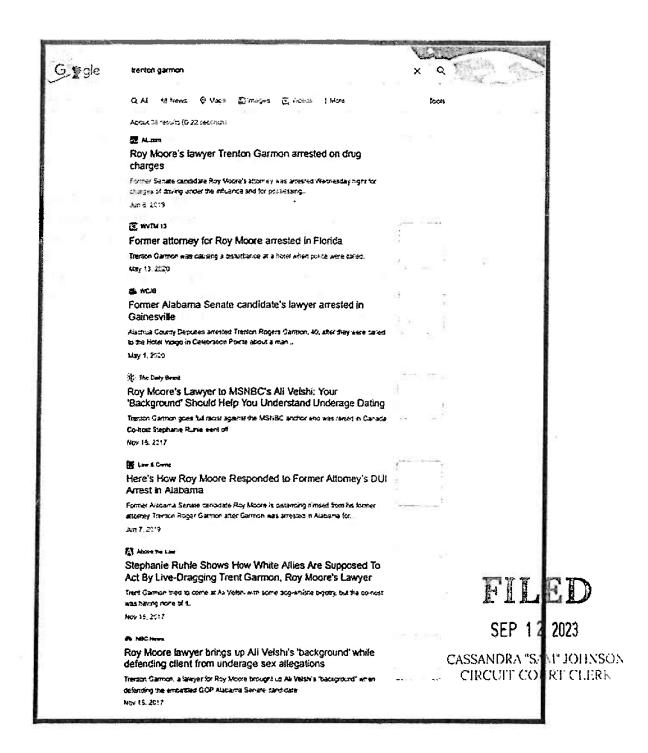


\*General Google Search with the Gainesville Police Brutality picture depicted as a "Attorney" professional picture while hundreds of other pictures are embedded online, thus indicating an intentional negative algorithm. Also contains a knowledge block with inaccurate information which Google refuses to correct, to include "m. 2009" as "married" while the Plaintiff is divorced and is planning to Annul, Court, date and have a proper Church Marriage. Hence, the Google algorithm is even limiting accurate information negatively affecting the Courting of the Plaintiff.

Page 1 - Google "News" Search Result with all "positive articles" suppressed and not listed among the thirty-eight results.



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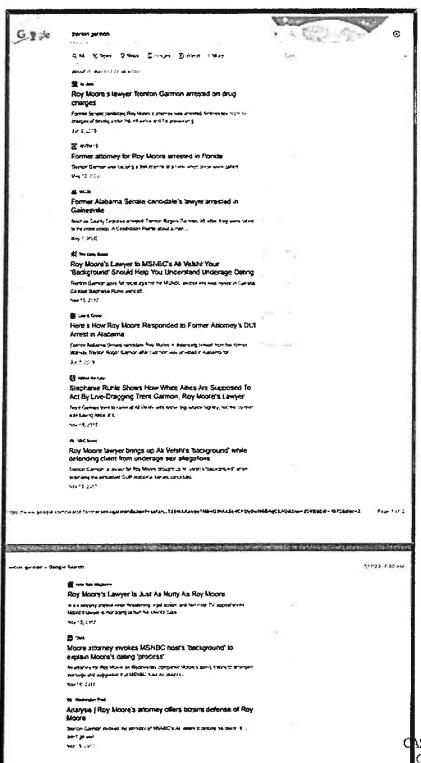


\*\*\*Google "News" search lists 38 articles, all negative displaying on three pages and yet suppressing, thus not listing at all, or the plumbline positive articles. One by al.com regarding a "Holy Water Case" victory and one on alreporter.com referring to Garmon as a Prominent Civil Rights Lawyer. So de facto results of the only three pages Google News search displays for the Plaintiff are thirty-eight negative results. The search also includes an "Ali Velshi" reference which has already been debunked and removed from Ali Velshi's wiki as all of the parties involved were Caucasian and the reference to

race was imputing or baiting a non-existent issue, specifically wherein Velshi is Muslim and compared to the free choice marriages of Christianity he is of a religious with forced marriages. Therefore, the debunking is suppressed and a race-baiting false context article is displayed by negative algorithm. The Plaintiff has had thousands of clients and the negative links to "Roy Moore" while suppressing positive articles is by design, defamatory, malicious and otherwise tortious. The Plaintiff father has routinely denounced all forms of sexual abuse to include upon minors and the imbalanced, defaming algorith intentionally ignores the principle rebukes and denouncing of the alleged abuse of minors lodged against anyone he has represented in civil rights matters. Lawyer may maintain the standard of care by stating "if it occurred, it is wrong" while defending the side of the client's story wherein reasonable and believable during the process of representation. The negative algorithm seeks to defame and punish the reputation of Plaintiff Trenton Garmon by negative association with an alleged behavior of a prior client which does not correlate to the personal life of the Plaintiff nor does it provide a balanced perspective of his legal career across thousands of client representations.

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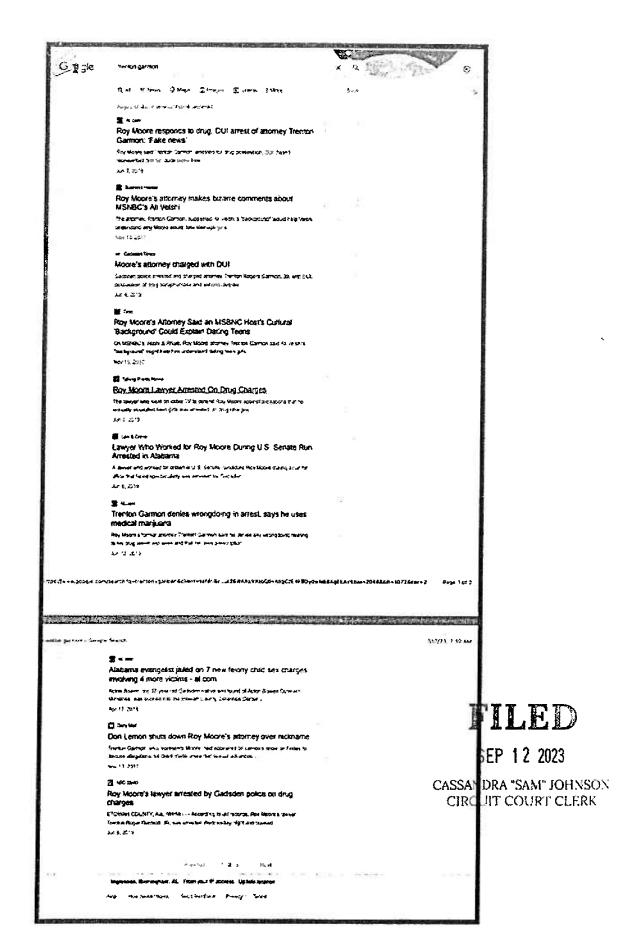
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\*\*\*Google's negative search engine algorithm even choses a "nutty" troll and attack article of the Plaintiff wherein the actual transcript of the responses indicated disapproval of the client's alleged behavior and the fact laden response was coherent, rational and relevant to the professional services rendered in advocacy. Hence, Google suppresses positive, real articles and via negative algorithm lists a "troll" blog as an article part of its "News" results. The results indicate a "white ally" fake and attack article wherein an interview involving only Caucasian parties had imputed racism and the article imputs "color" or race into a case which had zero objective basis for the observation and the comment was made by a Muslim and the article is by an African-American, thus displaying a negative algorithm against an Irish-Cherokee Catholic aka Caucasian Christian.

Page 2 - Google "News" Search Result

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\*\*\*The search result does not provide a fair and balanced result attaching without any counter or response, Plaintiff by link to a ministry (ABO) which was one of only hundreds of ministry services and otherwise represented a minimal amount of volunteer time and the action of the fallen evangelist was denounced by Garmon strongly in public. Hence, Google suppresses again positive results that Yahoo!, Bing.com and DuckDuckGo make retrievable. The results also suppress the misrepresentations of the CNN staff whose original, misrepresentative invitation was for a discussion regarding a Foundation while Garmon was then asked regarding another story as the main content. The suppression per se is evident. The results also suppress charitable and philanthropic work as the Plaintiff has averaged 150 plus hours even up to over 1,000 hours of volunteer services either as pro bono or as a former Pastor of a multi-economic, multi-racial evangelical church.

Page 3 - Google "News" Search Result

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<sup>&</sup>lt;sup>6</sup> Leading to the on-the-spot nickname seeking deference and "ease" in treatment due to the staff of Mr. Don "Cool & Crisp" like Lemon ...ade, being less than forthright with their subject matter invitation.

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\*Personal picture available for Google Webcrawlers, ignored completely by the Search Giant.

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## Giant.



{Node} {Mark Williams, Jonathan Green, Trenton Garmon, Michael Hastings, Alex Moore, Jeff Enke, Craig Cunningham, Jeff Kenney, Smitty and team after Valley Forge Football game – Army Football} [1999]

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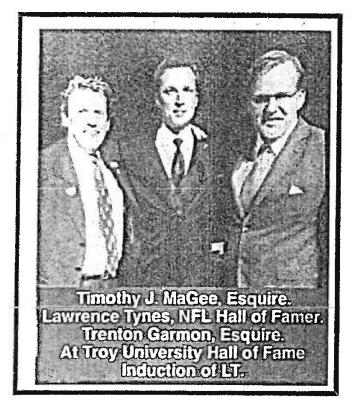


\*Personal

picture available for Google Webcrawlers, ignored completely by the Search

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\*Personal picture available for Google Webcrawlers, ignored completely by the Search Giant.

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\*Christian Broadcasting News & GFN - All Rights Reserved

\*Professional picture available for Google Webcrawlers, ignored completely by the Search Giant.



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\*Professional

picture available for Google Webcrawlers, ignored completely by the Search Giant.

\*Personal picture available for Google Webcrawlers, ignored completely



by the Search Giant.

\*Personal, professional, corrective and contextualizing picture available for Google Webcrawlers, ignored completely by the Search Giant regarding an incident of Police Brutality upon Plaintiff for calling "mass incarceration" "modern slavery". But rather than tag/link/associate this picture in the Knowledge Panel rotator or an actual professional picture of Garmon, Google choses to cast a false light using a photo of him immediately after an assault and body cavity strip search.

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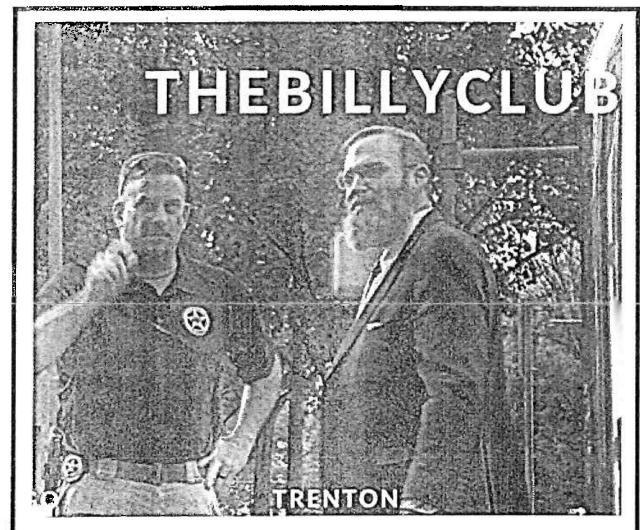
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\*Personal picture available for Google Webcrawlers, ignored completely by the Search Giant despite being the context of who was with Garmon during the police surveillance and immediately before being dropped off at a hotel where Garmon was assaulted and battered by Law Enforcement all on video which is also online for web crawling.

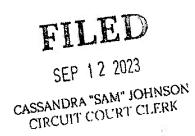
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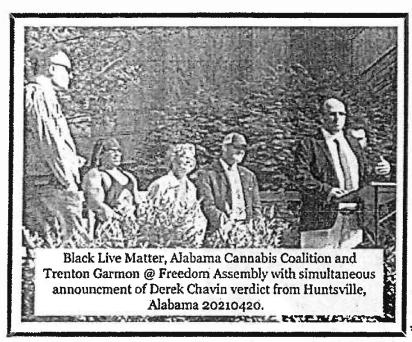
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\*United States Federal Marshall outside the Northern District Federal Court n Birmingham, Alabama USA confirming the drone fly zone our certified drone Pilot, John Tomik, had as a setting threshold was accurate and strictly enforced.

\*Professional picture available for Google Webcrawlers, ignored completely by the Search Giant depicting Garmon having a peaceful, orderly and civilized conversation with a U.S. Marshall wherein he fully obeyed and cooperated as has been his general reputation as an honorably discharged US Army Vet, dual college athlete and professional.





\*Cannabis, Police

Brutality and Liberty Civil Activism picture available for Google Webcrawlers, ignored completely by the Search Giant which was covered in the news by alreporter.com and al.com, yet suppressed by the Google "news" negative search algorithm. Garmon averages 350 - 500 hours per year in Christian or Civil Rights "voluneer" service data and pictures of which the Defendant Google intentionally ignores by algorithm.

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\*Professional picture

available for Google Webcrawlers, ignored completely by the Search Giant indicating a professional relationship with the Alabama Chief Justice and good community standing within the Alabama State Bar, ignored and not displayed in the Knowledge Panel photo rotator by design of Google's negative and anti-conservative algorithm. As an Ally Attorney with the Alliance Defending Freedom, Garmon served 150 hours per year of probono on average to the poor, disenfranchised and oppressed Christians.

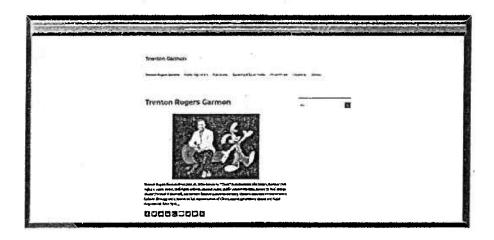
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https://www.gfile.news - Rebuttal documents, links to videos and actual articles by the Plaintiff the later of which is a contribution to the open news forum and done in good faith. Thus, troves of accurate information.

https://www.gfile.legal - Troves of data and even an AI Deep Learn Library with code which Google ignores in its web crawling and purported "organic" linking to the Plaintiff thus establishing de facto the negative algorithm.

## Below are Personal, Philothonpic and Professional picture available for Google Webcrawlers, ignored completely by the Search Giant.



\*Professional info site available for Google Webcrawlers, ignored completely by the Search Giant despite being listed by Yahoo!, Bing.com and DuckDuckGo within the first page as a natural organic platform disseminating true and accurate professional reputation information.

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on "drug charges" for a prescription shows up FIRST and then two other times for a total of three negative links while the response on the same platform (al.com) indicating a prescription shows up as number 24 on the bottom of page 2. Thus the article disclosing medical prescription is suppressed in the Google "news" search while the "negative"/arrest article is listed on the first page as number one given the defaming article by negative algorithm.

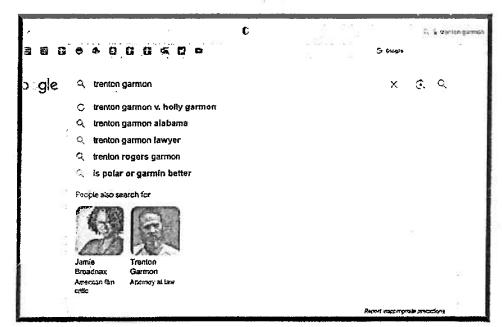
- IV. <a href="https://theclick.news/meta-hit-with-alabama-class-action-lawsuit-over-childrens-privacy-rights-on-facebook/">https://theclick.news/meta-hit-with-alabama-class-action-lawsuit-over-childrens-privacy-rights-on-facebook/</a> Positive Article available and not indicated even as a result on Google News.
- V. <a href="https://www.scribd.com/document/462659890/Pinellas-Sheriff-Falsely-Arres-ts-Lawyer-Pastor-Veteran-for-DUI-and-Child-Abuse">https://www.scribd.com/document/462659890/Pinellas-Sheriff-Falsely-Arres-ts-Lawyer-Pastor-Veteran-for-DUI-and-Child-Abuse</a> Confirms the actual "Not Guilty" and dispels fake news, but Google does not even return a result for this link despite the other search engines listing it.
- VI. <a href="mailto:ttps://topclassactions.com/lawsuit-settlements/privacy/meta-class-action-alle-ges-company-violated-privacy-rights-of-minors-by-harvesting-their-data/--positive link listed by other search engines, but Google "News" completely suppresses it.
- VII. <a href="https://about.me/trenton-garmon">https://about.me/trenton-garmon</a> Positive objective, general data source which Google suppresses.

Social Media Accounts with Pictures and real-world accurate data and true stories:

https://www.facebook.com/churchofthecoast/ - Clear and balanced pictures, newsfeed posts and videos of the Plaintiff which Google suppresses and otherwise ignores in its general search result.

https://www.trentongarmon.info - Clear and balanced timelines of the personal, philanthropic and professional life of the Plaintiff which Google intentionally ignores and otherwise suppresses in its general and "News" search result given article links and source material are included.

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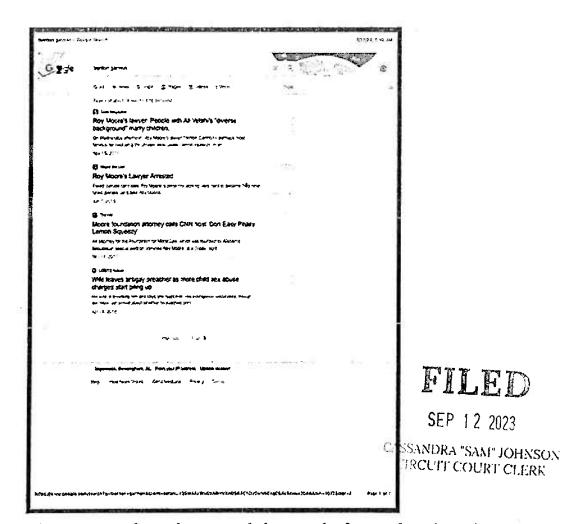
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\*Illustration from 20230828 of Google simple search basic "thumbnail" picture of one moment which included being the victim of police brutality and rather than displaying pictures of victories in court, victories in college football or baseball, family photos available online - the defendant Google's negative algorith intentionally depicts a defaming moment in false light. The below pictures are available for thumbnail and "Attorney at Law" is displayed while the pictures is of the Plaintiff following civil activism and a framed arrest with police brutality involved. The description as an "Attorney" under a thumbnail not related to practicing law is per se indication of the negative algorithms intentions.

## ARTICLES WITH TYPICAL/GENERAL PICTURES AND SITES SUPPRESSED

- I. <a href="https://www.al.com/breaking/2013/04/accused\_holv\_water\_sprayer\_joy\_2.html">https://www.al.com/breaking/2013/04/accused\_holv\_water\_sprayer\_joy\_2.html
  ml Holy Water case with a verdict of "Not Guilty" references the Plaintiff as counsel and is completely suppressed, and not even listed on a Google News result despite being on Al.com.
- II. <a href="https://www.alreporter.com/2021/04/20/alabama-cannabis-coalition-to-hold-event-in-huntsville-today/">https://www.alreporter.com/2021/04/20/alabama-cannabis-coalition-to-hold-event-in-huntsville-today/</a> Prominent Civil Rights Lawyer Positive Articles;
- III. <a href="https://www.al.com/news/anniston-gadsden/2019/06/trenton-garmon-denies-wrongdoing-in-arrest-says-he-uses-medical-marijuana.html">https://www.al.com/news/anniston-gadsden/2019/06/trenton-garmon-denies-wrongdoing-in-arrest-says-he-uses-medical-marijuana.html</a> News of arrest



\*\*\*The negative news search result even excludes records, facts and services of Garmon to the named politician which Google takes such issue. Meaning the Plaintiff represented a controversial politician over a seven (7) year time period in no less than four (4) cases involving him and his family with all being considered successful and reasonable, albeit disputes of fact. Plaintiff successfully had the politicians real property taxes lowered, kept his son out of jail, and obtained increased family time in domestic issues all of which in general is public record, yet Defendants refuse by negative algorithm to render any of the positive results. The last article even does not distinguish between Acton Bowen and Trenton Garmon in the display stating "Wife leaves antigay preacher as more child sex abuse allegations pile up" therein making it unclear who the article is about. Garmon has never been accused of such conduct being clear about his struggle with wine, depression and chronic pain. Thus, the negative algorithm casts a false light listing as a "result" a limited display causing an objective viewer to confalate the criminal actions of another as behavior associated with the Plaintiff. Reference to "background of Ali Velsher" without including other online references to Velsher as a 'Muslim' while Christians do not arrange marriage, but rather age appropriate dating between the male and female gender. Objective negative algorithm coding related to being a Caucasian Christian.

## **COMPOSITE EXHIBIT A**

State Court Action Orders

DOCUMENT 3

Case 4:23-cv-01525-CLM

Document 1-1 Filed 11/09/23 Page 5/13/2023 2:47 PM
31-CV-2023-000072.00
CIRCUIT COURT OF
ETOWAH COUNTY, ALABAMA
CASSANDRA JOHNSON, CLERK

State of Alabama Unified Judicial System	ORDER ON AFFIDAVIT OF	W-23-72 1
Form C-10-CIVIL Page 3 of 3 Rev. 9/2023	SUBSTANTIAL HANDSHIP (Request to Walve Filing Fees)	Cot Cot
IN THE Trenton (Circuit or District)	(Request to Waive Filing Fees)  ODA CLUCIURT OF Alphabet Inc. (Name of Columy or Mic.)	dbla Goodlabama
	is testimony, his or her poverty level as measured by the Un that payment by the Affiant would cause. IT IS, THEREFOR	ited States newarty midelines and
guidelines or the Affiant I	ne Afflant is NOT INDIGENT and the Afflant's income is not has the resources to pay for the requested items without sub	within the United States poverty estantial hardship:
☐ The case or situation☐ Other (please specify	is not one for which the request is applicable.	
The Afflant is INDIGENT.	Therefore, the prepayment of filing fees and costs is hereby on of the case.	y waived, and these fees and costs
Other (please specify):		
Done this 9-(3-2025)	(Signature of Cival)	DAV , 57. Judge)